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BY ECF

September 12, 2022

Hon. Pamela Chen
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: USA v. Mustafa Goklu
19-CR-386

Your Honor:

I and Emilee Sahli represent Mustafa Goklu in the above-referenced matter. We are writing to request that the following questions be asked of the prospective jurors during voir dire.

Have you or, to your knowledge, a close family member or friend, either purchased or sold Bitcoin or any other cryptocurrency?

Does anyone have any views about the existence or use of any cryptocurrency that would interfere with your ability to be fair and impartial in a case that involves Bitcoin.

Have you or, to your knowledge, a close family member or friend, had experience with or otherwise participated in foreign financial transactions, e.g., sending money to or receiving money from a person or business in another country.

We would ask the Court to follow up as appropriate with any answer that raises any concern about the juror's ability to be fair and impartial in this matter.

Thank you for your consideration.

Very truly yours,

/s/
Murray Singer

cc: AUSA Gillian Kassner by ECF and email
AUSA Marietou Diouf by ECF and email